

Barneys Canyon Mine
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Robert J. Ramsey
General Manager

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DIVISION OF
OIL GAS & MINING

 **Kennecott**

March 17, 1992

Mr. Wayne Hedberg
Mr. Holland Shepherd
State of Utah, Department of Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Gentlemen:

In response to your memorandum of February 21, regarding points of interest discussed in the review meeting of February 11 involving Kennecott Barneys Canyon and DOGM personnel, the following comments are provided to assist you in processing the current operating permit application. These comments, presented below, are referenced according to subject heading, page and paragraph in your memorandum.

Pit Water Quality, page 1, last paragraph.

Kennecott transmitted a copy of the new plan amendment to the Division of Water Quality on February 13.

Pit Water Quality, page 2, first paragraph.

Acid-base potential analyses of samples of waste and wall rock materials from the North BC South and South BC South deposits are currently being analyzed by a qualified laboratory. These results will be provided to the Division in the revised plan amendment. The original Barneys Canyon mine NOI presented data from acid-base potential tests from Melco ore and waste rock samples. Kennecott believes that these samples are representative of ore, waste, and wall rock materials that will be generated during mining or exposed in the wall rocks of the Melco pit. Therefore, no further testing of Melco ore and waste samples is proposed.

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Waste Water Quality, page 2, second paragraph.

The statement that the proposed BC South waste rock dump will "probably impound water throughout most of the year" is inaccurate. Because the waste rock material in the dump which will form the impoundment "dam" is highly permeable, it is unlikely that the impoundment will contain runoff except for relatively short time periods following precipitation events. This assessment is confirmed by Kennecott's observations at other similarly constructed impoundments in the Barney's Canyon mine area.

Waste Water Quality, page 2, last paragraph.

The statement that the overburden waste rock material at BC South will be both carbonaceous and calcareous is incorrect. Neither of the deposits contain any carbonaceous material. The material is primarily quartzite and sandstone with localized areas of carbonate cement and small carbonate lenses. The carbonate material will provide neutralizing potential.

SEC 3.2.4, PG 17 OF REVISION
CARBONACEOUS ORE MAY BE PLACED
IN WASTE DUMP

SEC 3.3 CALCAREOUS SANDSTONE

Kennecott will commit to blending any sulfide waste rock that is encountered in the BC South pits with non-sulfide, calcareous waste rock. This blending would be accomplished during waste rock loading and dumping activities.

Waste Water Quality, page 3, first paragraph.

As discussed above, testing of the BC South waste and wall rock samples is in progress and data for Melco is already in hand.

Backfilling Pits, page 3, third paragraph.

The statement that "Kennecott personnel indicated they had not considered backfilling an option" is not entirely correct. Kennecott considered backfilling during the mine planning phase of the BC South pre-development and determined that current economics require that the two deposits be stripped of overburden concurrently. At this time, Kennecott believes that sufficient evaluation of backfilling has been done and continues to believe that the need for concurrent overburden stripping is necessary from an economic standpoint. Kennecott will consider pit backfilling in the event that mining plans and/or mine economics change.

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Slope Reclamation, page 4, first paragraph.

Kennecott will prepare text that will address the issue of regrading and stabilization of reclaimed slopes that are steeper than 3h:lv.

Melco Dump Slopes, page 4, fourth paragraph.

Kennecott agrees to test the regrading and slope stabilization techniques discussed at the February 11 meeting with DOGM during its planned regrading activities on the 6300 dump slope scheduled for later this year.

Melco Dump Slopes, page 4, fifth paragraph.

Kennecott is prepared to further discuss with the Division alternatives to the currently approved slope stabilization method that is planned for the lower Melco dumps.

Topsoil Stockpiles, page 5, second paragraph.

Kennecott will clearly designate all topsoil stockpile locations on maps to be provided with the revised plan amendment.

Overall Barneys Canyon Plan Review, page 5, third paragraph.

Kennecott will agree to provide a fully revised MRP taking into account the proposed Melco expansion and BC South facilities described in the plan amendment, as well as the minor modifications to operations which have occurred or are anticipated. Following completion of the current amendment process, Kennecott will also fully evaluate all opportunities for enhancement of the mine reclamation plan, including Barneys Canyon pit bench revegetation, and include such improvements in the revised MRP.

Maps, page 5, last paragraph.

Kennecott will prepare disturbed area maps discriminating between areas currently disturbed and covered by the original MRP and those

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that would be disturbed under the plan amendment. Undeveloped components of the original MRP, principally leach pads, would also be shown on these maps.

Revegetation, page 6, first paragraph.

Any reasonable changes to the revegetation seed list which might be proposed by DOGM would be acceptable to Kennecott.

Sediment Control and Runoff, page 6, second and third paragraphs.

Kennecott agrees to upgrade its haul road drainage and sediment control network. The MRP amendment will be revised to include a description of the new sediment control devices. Kennecott will also examine the capacity of the temporary Melco sediment impoundment and ensure that it has both the capacity to store the discharge that would result from the 25-year/24-hour precipitation event.

Permit Package, page 6.

As stated above, Kennecott will prepare a fully revised MRP. Preparation of such a revised document will require substantial amounts of time on the part of both Barneys Canyon staff and its consultants. Given Kennecott's need for timely approval of the plan amendment to meet its 1992 planning activities, Kennecott believes that the MRP revision should be completed after the amendment is approved and the issues associated with its approval have been resolved. This will also allow Kennecott sufficient time to fully assess the opportunities that exist for modification of its approved reclamation plan, including revegetation of benches in the Barneys pit area. The latter will require re-examining the mining plan to enable the following: 1) benches; 2) evaluation of bench access alternatives taking into account potential impacts to both continued pit development and currently undisturbed areas adjacent to the pit.

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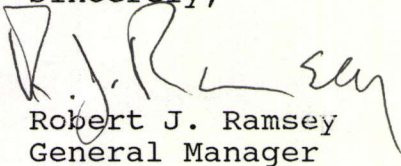
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Impoundments, page 7, second paragraph.

Kennecott is aware that the impoundment which will be created by the BC South dump will require approval by the State Engineer prior to its construction and commits to obtaining such approval.

Sincerely,


Robert J. Ramsey
General Manager

RJR/bam

cc D. Z. Skolasinski
W. C. Dodge

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